

## Polek, Jim

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**From:** Strauss, Alexis  
**Sent:** Tuesday, December 09, 2014 3:40 PM  
**To:** Dunkelman, Tom;Greenberg, Ken;Allen, HarryL;Manzanilla, Enrique  
**Cc:** Waldon, MARGARET;Powell, Martin;Kao, Jessica  
**Subject:** RE: Ventura County Waste Water Issues

Tom, thanks for representing EPA before the Ventura Supervisors. When you refer below to the expiring permit, who issued that permit?

Enrique, Harry, Ken: I suggest it's timely that we convene the key R9 programs and determine the compliance status of these two facilities from an EPA and Regional Water Board view, who has been using these commercial facilities, and what the alternatives may be.

Enrique: I've asked ORC, Enforcement and Water to pursue this...do you want Superfund to be involved, or remain focused on the removal?

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**From:** Dunkelman, Tom  
**Sent:** Tuesday, December 09, 2014 3:26 PM  
**To:** Greenberg, Ken; Allen, HarryL; Manzanilla, Enrique; Strauss, Alexis  
**Cc:** Waldon, MARGARET; Powell, Martin  
**Subject:** Ventura County Waste Water Issues

Today I attended a meeting of the Ventura County Supervisors. The focus of the meeting had less to do with the current emergency response at the Santa Clara Waste Water facility, and more to do with the current and future status of the only two commercial wastewater treatment facilities in the County – Santa Clara and Anterra (which does underground injection). My only involvement in the meeting was to briefly respond to a question from one of the Supervisors regarding EPA involvement in the permitting and regulation of these facilities. I responded that the Superfund Emergency Response program was not involved in regulatory issues pertaining to these facilities, but would pass the question on.

There was a fairly sizeable audience and this seems likely to be a significant issue that would involve EPA in the future. Here is a quick summary of the issue.

The Santa Clara Waste Water facility had a fire and explosion three weeks ago, and has been shut down ever since, while the cleanup is ongoing. The facility faces very significant hurdles before (if?) it is allowed to re-open. These hurdles include an ongoing criminal investigation by the Ventura Count DA. There is a 14 mile pipeline that extends from the Santa Clara facility to the City of Oxnard wastewater treatment plant. There have been at least two significant rad exceedances in the discharge from Santa Clara to the Oxnard plant, and consequently Oxnard is no longer accepting treated waste water from Santa Clara. There are also significant H2S issues in the wastewater coming from Santa Clara. The City of Oxnard only receives abOut \$350,000 per year from Santa Clara, and it seems likely they may decide against allowing Santa Clara to discharge water to them in the future. This would appear to put the future of the Santa Clara Waste Water facility in question.

The only other commercial wastewater treatment facility in the County is the Anterra facility. This facility receives a much smaller range of waste streams (typically only oily water and brine from small oil producers). With the recent fire and explosion at Santa Clara, there is a lot of focus on the Anterra facility as well. During the meeting, there were many concerns raised regarding the safety of having a facility of this type in close proximity to schools and residences in Oxnard. EJ issues were also raised. There were an equal number of comments from the audience (primarily industry types), regarding the need to have this type of facility in the County and the associated jobs. With Santa Clara being closed, the Anterra facility has been allowed to receive a greater number of truckloads per day (44 – up from the

permitted number of 24). This exemption ends on Saturday. The Anterra facility is also up for a new permit in the next two years or so.

I am not sure to what degree EPA is involved in the permitting and regulation of these two facilities, but I am sure there will additional questions and issues forthcoming. These issues seem to be heightened by the concern that some of the wastewater coming to both of these facilities may be related to fracking.